



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 27, 2018

BY ECF and EMAIL

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Reichberg and Grant,
S2 16 Cr. 468 (GHW)**

Dear Judge Woods:

The Government respectfully writes in response to the Court's order adjourning the trial in this matter until May 14, 2018 (Dkt. No. 226). In its Order, the Court indicated its willingness to entertain a longer adjournment, until late Summer or Fall 2018, if necessary to permit the defendants to prepare for trial.

The Government's deadline to produce 3500 material regarding one of its key witnesses at trial would be this coming Monday -- May 1, 2018 -- assuming a May 14 start, and potentially considerably later if the trial were to be moved. There is a later deadline -- again, defined relative to the start of trial -- for the 3500 material for the remaining witnesses. The Government wishes to build level of certainty into its preparation and coordination of witnesses, some of whom are traveling to testify from out of town. The Government further wishes to guard against the possibility of the 3500 materials being produced and the trial *subsequently* being adjourned (thus giving the defendants a period of months in possession of the 3500 material and conferring upon them an undue advantage).

The Government therefore respectfully requests that the Court impose a deadline of May 1, 2018 at noon for any request for a longer adjournment to be filed by the defendants. The Government has conferred with counsel for both Reichberg and Grant, in accordance with the

By: /s/
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